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CHEVRON U.S.A. INC.,
a Pennsylvania corporation

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
Plaintiff,)	
)	AMENDED JOINT EXHIBIT LIST AND
vs.)	STIPLUATION RE: ADMISSIBILITY
)	
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through 10,)	
inclusive,)	District Judge: Hon. Hernan D. Vera
)	Magistrate Judge: Hon. A. Joel Richlin
Defendants.)	Action Filed: August 3, 2023
)	Pre-Trial Conference: July 29, 2025
)	Trial Date: August 19, 2025
)	
)	

Ex.#	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
1	DELETED			
2	DELETED			
3	DELETED			
4	Risk of Rupture or Dissection in Descending Thoracic Aortic Aneurysm - 9/2/15 (CUSA000619-638) Dr. Levy's Depo Exh. B	Dr. Levy		
5	Physical requirements and working conditions form for REM position 11/9/16 (CUSA000208-220)	Banks Snookal	X	
6	Chevron Medical Examination Program Guidelines – July 2017 (CUSA000837-944)	Dr. Levy	X	
7	Escravos Medevac Records for 2017-2022 (CUSA000830-833)	Dr. Adeyeye	X	
8	Escravos Fatalities 2017 – 2022 (CUSA000834-836)	Dr. Adeyeye	X	
9	DELETED			
10	DELETED			
11	DELETED			
12	HR Policy 410 Employment of Individuals with Disabilities – 4/1/19 (CUSA00013-18)	Powers	X	
13	Snookal CT and echo result from Kaiser Permanente – 4/16/19 (CUSA000223-227 CUSA000818-822)	Dr. Khan	X	
14	Affirmative Action Program for Individuals with Disabilities & Protected Veterans – 4/1/19 – 3/31/20 (CUSA0001682-1705)	Powers		

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
15	Mark Snookal's Kaiser Medical Records – 4/19/19 (Snookal-00641-643; 789-806); and Unredacted	Khan	X	
16	Job Description: NMA EGTL Reliability Engineering Manager – 5/7/19 (Snookal-01157-58)	Snookal	X	
17	DELETED			
18	DELETED			
19	Email to Mark Snookal re Acceptance of NMA EGTL Reliability Engineering Manager (PSG 23-24, FL 4-6) position in Escravos, Nigeria, - 6/20/19 (CUSA0001147-1148)	Snookal	X	
20	Assignment Offer Letter – 7/1/19 Snookal-00647-650	Snookal	X	
21	DELETED			
22	DELETED			
23	DELETED			
24	Email thread re New Assignment to Nigeria – 7/11/19 (CUSA0001238-1241)	Snookal	X	
25	Mental Health Questionnaire – completed by Snookal – 7/18/19 (CUSA000188)	Snookal	X	
26	Authorization for Disclosure of Health Information, signed – 7/18/19 (CUSA000577-578)	Snookal	X	
27	DELETED			
28	DELETED			
29	MSEA exam of Mr. Snookal completed by	Dr. Sobel	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	Dr. Sobel – 7/24/19 (Snookal-00605-610)			
30	Dr. Irving Sobel’s voicemail message to Mark Snookal and transcript (Snookal-001925)	Snookal Dr. Sobel	X	
31	Emails between Snookal and Dr. Khan re: Rotational Work in Nigeria – 7/24/19 (Snookal-01284)	Snookal Dr. Khan	X	
32	Chevron Medical Suitability for Expatriate Assignment History & Physical Examination for Snookal – 7/24/19 (CUSA000025-30)	Snookal Dr. Sobel	X	
33	Dr. Khan’s letter – 7/29/19 re Snookal condition (Snookal-00665)	Snookal Dr. Khan	X	
34	Kaiser Permanente Medical Record for Snookal – visit date: 4/3/19; “Received 7/29/19) (CUSA00223-227)	Dr. Khan	X	
35	Dr. Victor Adeyeye’s Position Summary – Job Description – 2019 (CUSA0002774)	Dr. Adeyeye	X	
36	Dr. Ujomoti Akintunde’s Position Summary – Job Description – 2019 (CUSA0002775)	Dr. Akintunde	X	
37	Dr. Asekomeh Eshiofe’s Position Summary – Job Description – 2019 (CUSA0002778)	Dr. Asekomeh	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
38	Email from Dr. Asekomeh to Dr. Pitan re: Snookal medical report – 7/30/19 (CUSA0001525)	Dr. Asekomeh	X	
39	Email thread between Olorunfemi Pitan, Victor Adeyeye, Eshiofe Asekomeh and Henry Aiwuyo re Mark Snookal Medical Report – 7/30/19 – 8/15/19 (CUSA0001426-1429; 1486-1507; 1522-1525; 1528-1532)	Dr. Adeyeye Dr. Asekomeh	X	
40	DELETED			
41	DELETED			
42	DELETED			
43	Email chain re: Mark Snookal’s Medical Report – 8/5/19 (CUSA000768-770)	Dr. Adeyeye Dr. Asekomeh	X	
44	Email thread with Asekomeh, Akintunde re: Akintunde’s opinion (follow-up to Aiwuyo opinion) – 8/5/19 (CUSA000771-774)	Dr. Asekomeh Dr. Akintunde	X	
45	DELETED			
46	Asekomeh email to Pitan re: cardiology summary and Dr. Aiwuyo – 8/7/19 (CUSA0001526-1527)	Dr. Asekomeh	X	
47	Dr. Asekomeh email to Dr. Olorunfemi Pitan re: Snookal medical summary – 8/7/19 (CUSA000816-823)	Dr. Asekomeh	X	
48	Email thread re Mark Snookal Medical Clearance “and just checking in” – 7/29/19; 8/2/19; 8/8/19 (CUSA0001009-1012;	Dr. Asekomeh	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	1181-1182; 1190-1193)			
49	Maintenance Change Operating Assistant (OA) Job Description – 8/11/19 (CUSA000550-551)	Snookal	X	
50	DELETED			
51	DELETED			
52	DELETED			
53	DELETED			
54	“Expatriate Exam Recommendations” – 8/15/19 (Snookal-01099)	Dr. Asekomeh	X	
55	Email from Dr. Pitan to Dr. Asekomeh – 8/15/19 (CUSA000824-827)	Dr. Asekomeh	X	
56	Email from Asekomeh to Bijo Velante Mirabueno – 8/15/19 (CUSA000828)	Dr. Asekomeh	X	
57	DELETED			
58	DELETED			
59	Email thread re: Snookal medical report - 8/15/19 (CUSA0001520-1521; 1522-1525)	Dr. Adeyeye	X	
60	Email from Mark Snookal re Erin McGregor Referral – 8/15/19 (CUSA0001002)	Snookal	X	
61	Email thread between Dr. Frangos, Pitan, Asekomeh and Levy re MSEA Case – 8/15/19 (CUSA000824-827)	Dr. Asekomeh	X	
62	DELETED			
63	Email thread Dr. Frangos to Dr. Levy and Dr. Arenyeka re: Nigeria Medical Determination –	Dr. Levy	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	8/20/19 (CUSA0001003-1006)			
64	Dr. Levy email thread with Dr. Arenyeka - 8/20/19 re Snookal (CUSA0001539-1542)	Dr. Levy	X	
65	Emails between Dr. Levy and Snookal re: medical – 8/23/19 (CUSA000639-641) Levy’s Depo Ex. A	Snookal	X	
66	Email from Dr. Levy to Eldyleida Seca Torres re: MSEA - 8/23/19 (CUSA0001041)	Dr. Levy		
67	DELETED			
68	Email string between Dr. Levy and Dr. Kahn – 8/23 and 8/26/19 re Patient MS (CUSA000557-558)	Dr. Levy	X	
69	Email thread btwn Dr. Levy and Dr. Arenyeka re: Patient MS 8/26/19 (CUSA000995-997)	Dr. Levy	X	
70	Levy email thread – 8/29/19 (CUSA0001050-1052)	Dr. Levy	X	
71	DELETED			
72	DELETED			
73	DELETED			
74	Email thread re Mark Snookal not medically cleared – 8/30/19 (CUSA1430-1432; 1447-1450)	Dr. Levy	X	
75	Email to Amir Zaheer re candidate for NMA EGTL Reliability Engineering – 9/3/19 (CUSA0001358)	Zaheer	X	
76	Email from Andrew Powers re: the Rescinded Job Offer in Nigeria – 9/4/19	Powers	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	(CUSA000538-540)			
77	Emails from Andrew Powers to Dr. Ayanna Jones – 9/4/19 (CUSA000650-651)	Powers	X	
78	Dr. Scott Levy email “Thanks. I got this” - 9/4/19 (CUSA000983-985)	Dr. Levy	X	
79	Email thread between Dr. Jones Ayanna and Andrew Powers re: Rescinded Job Offer in Nigeria – 9/4/19 (CUSA000993-994)	Powers	X	
80	DELETED			
81	International Journal of General Medicine Article (CUSA0002830-2834)	Dr. Adeyeye		
82	Email thread regarding Mark Snookal’s disability discrimination complaint – 9/4/19 – 9/6/19 (CUSA000542-543)	Powers Snookal	X	
83	Email thread re: Positions in 2H PDC - 9/5/19 (CUSA000541)	Snookal		
84	Emails Re: Nigeria Medical Determination – 9/5/19 (CUSA0001236-1237)	Snookal	X	
85	Email from Andrew Powers to Snookal – 9/8/19 (Snookal 00637-639)	Snookal	X	
86	Email thread with Powers and others – 9/4/19; 9/9/19 (CUSA000644-646)	Powers		
87	El Segundo Operating Assistant DS&C – MFG- (2 positions PSG 22-23) – 9/13/19	Snookal		

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	(CUSA000552-554)			
88	Email from Dr. Levy to Snookal re: medical – 9/16/19 (Snookal-00645-646) (CUSA000559-550)	Dr. Levy Snookal	X	
89	Snookal Email re: Positions he applied – 9/24/19 (CUSA0001645-1653)	Snookal		
90	Email from Tse to Snookal re: Maintenance Change Operating Assistant – 9/25/19 (CUSA000653-655)	Snookal	X	
91	Email from Powers to Tse re: M & R change – 9/25/19 (CUSA000683)	Snookal	X	
92	Job Description for Maintenance Change Operating Assistant – 9/25/19 (Snookal-01131-32)	Snookal	X	
93	Job Description: DS&C – MFG – El Segundo Operating Assistant – 10/11/19 (Snookal-01150-52)	Snookal	X	
94	Job Description: DS&G – MFG – El Segundo Routine Maintenance General Team Lead – 10/11/19 (Snookal-01122-23)	Snookal	X	
95	Emails thread Austin Ruppert, Thalia Tse, and Powers re: Mark Snookal New Position – 11/6/19 (CUSA000642-643)	Tse Powers	X	
96	Position Summary – Reliability Change Operating Assistant –	Banks	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	11/6/19 (CUSA000498-500)			
97	Job Offer for Reliability Change Operating Assistant – 11/19/19 (Snookal-01136)	Snookal	X	
98	Email thread re: offer letter position for Mark Snookal in Workday – 11/20/19 (CUSA000679-682)	Tse Snookal	X	
99	DELETED			
100	DELETED			
101	DELETED			
102	DELETED			
103	DELETED			
104	DELETED			
105	DELETED			
106	DELETED			
107	Nippon Dynawave Packaging Co. Offer of Employment to Mark Snookal and signed by him – 8/3/21 (NDP-SDT 1-2; Snookal, Ex. 22)	Snookal	X	
108	Nippon Dynawave Packaging Benefits Guide (Snookal-01444-01477)	Snookal	X	
109	Email and Letter of Resignation from Mark Snookal to Thalia Tse – 8/4/21 (CUSA000656-658)	Snookal	X	
110	DELETED			
111	DELETED			
112	DELETED			
113	DELETED			
114	Georgia-Pacific 2023 Benefits Guide (Snookal-01478-1507)	Snookal Baum	X	
115	Records Produced by Georgia-Pacific LLA re	Snookal Baum	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	Snookal's employment post Chevron			
116	Offer letter to Mark Snookal from Chris Lundquist at Koch Industries – 7/7/23 (Snookal 1526-1527)	Snookal	X	
117	Letter to Mike Savageaux from Mark Snookal resigning from Nippon Dynawave - 8/14/23 (NDP-SDT 3; Snookal, Ex. 23)	Snookal	X	
118	Plaintiff Mark Snookal's Objections and Responses to Deft Chevron USA, Inc.'s Interrogatories, Set One – 3/28/24	Snookal		
119	Deft Chevron's Responses to Plaintiff Snookal's Request for Production of Documents, Set One – 6/5/24	Scott M. Banks		
120	Plaintiff Mark Snookal's Rebuttal Expert Disclosures (FRCP Rule 26(a)(2) – 9/3/24 (Marmureanu M.D., Exh. 1)	Dr. Marmureanu		
121	Dr. Alexander Marmureanu's CV	Dr. Marmureanu		
122	Expert Report of Dr. Alexander Marmureanu – 10/9/24	Dr. Marmureanu		
123	Deft Chevron's Supplemental Responses to Plaintiff Snookal's Special Interrogatories Nos. 20-24, Set Two – 1/13/25	Harpreet K. Tiwana		
124	Deft Chevron's	Tiwana		

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	Objections and Responses to Plaintiff Snookal's Request for Production of Documents, Set Four (Nos. 47-66) – 2/25/25			
125	Deft Chevron's Response to Plaintiff's Interrogatory No. 26 - 33 - 2/25/25	Tiwana		
126	Chevron's Objections and Supplemental Responses to Plaintiff Snookal's Interrogatories, Set Three – 4/25/25	Tiwana		
127	Location Premiums by Area of Assignment (CUSA000501-502)	Snookal	X	
128	Cover page to the Chevron Tax Equalization Policy, Human Resources Shared Services (CUSA000503 – Powers, Exh. 2)	Powers	X	
129	Chevron Tax Equalization Policy (CUSA000503)	Powers	X	
130	HR Policy 400 for U.S. Payroll Employees (CUSA000348-350)	Powers	X	
131	HR Policy 410 for U.S. Payroll Employees (CUSA000014-18)	Powers	X	
132	Rotational Expatriate Assignments (Snookal-01285-1301)	Snookal	X	
133	Snookal Personal Experience Record (CUSA000261-265)	Snookal	X	
134	Chevron Employee Handbook – El Segundo Refinery (CUSA000298-342)	Powers	X	

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
135	General Team Leader/Area Maintenance Lead PSG 23 Position Summary (CUSA000548-549)	Banks	X	
136	DS&C – MFG - El Segundo Routine Maintenance General Team Lead (PSG 23) (CUSA000555-556)	Banks	X	
137	Scott Levy's CV (CUSA0001565-1572)	Dr. Levy		
138	DELETED			
139	Victor Adeyeye's CV (CUSA0001737-1741)	Dr. Adeyeye		
140	Anthony Edward Reading's CV and documents relied upon by Dr. Reading	Dr. Reading		
141	Anthony E. Reading PhD Rule 26 Log (Snookal-02056-2064)	Dr. Reading		
142	Dr. Asekomeh Eshiofe CV (CUSA0002776-2777)	Dr. Asekomeh		
143	Corporate Governance Policies (CUSA0001730-1735)	Powers		
144	DELETED			
145	DELETED			
146	DELETED			
147	Dr. Charles Baum CV	Dr. Baum		
148	Dr. Charles Baum Report and Documents relied upon	Dr. Baum		
149	DELETED			
150	DELETED			
151	Snookal's Chevron Exit Interview (CUSA000544-547)	Snookal	X	
152	Incidence of Aortic Rupture and Aortic Dissection in a 4.2. cm Ascending Aortic Aneurysm	Dr. Marmureanu		

Ex. #	Description	Witness Establishing Foundation	ADMITTED BY STIPULATION	Date Admitted
	(Marmureanu M.D., Ex. 3)			
153	DELETED			
154	Expert Report and CV of Chen Song, Ph.D.	Dr. Song		
155	Email thread between Snookal and Cortina re: Nigeria medical determination – 8/19/19 & 9/15/19 CUSA0001236-1237	Snookal	X	
156	Email from Birabueno to Snookal re: Nigeria TWP Expatriate Assignment Outreach – Phase 2 Rotational – 8/2/19 CUSA0001386-1392	Snookal	X	
157	Dr. Irving Sobel’s CV	Dr. Sobel		
158	Kaiser Permanente Allied Health/Nurse Visit – L. Engel Depo Exh. 1		X	

DATED: August 8, 2025

ALLRED, MAROKO & GOLDBERG

By: _____

DOLORES Y. LEAL
OLIVIA FLECHSIG
Attorneys for Plaintiff,
MARK SNOOKAL

DATED: August 8, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLC

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